

December 2, 2019

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By ECF Filing

The Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: United States v. Michael L. Cohen, 17 CR 544 (NGG)

Dear Judge Garaufis:

We represent defendant Michael Cohen in connection with the above-referenced case. This letter is submitted to request a temporary modification of Mr. Cohen's bail conditions to permit him to travel later this month for the holidays. The government has no objection to this request.

As the Court will recall, Mr. Cohen was arraigned and released on bail in June 2018. Under the bail terms set by the Court, Mr. Cohen was permitted to return home to London, England to live during the pendency of the case and while in the U.S., is allowed to travel within the Eastern and Southern Districts of New York and the Districts of Maine and Massachusetts. Since then, he has returned to the U.S. on multiple occasions for court appearances in this case. During the pendency of this case, the government and the Court have approved travel by Mr. Cohen outside England and the United States on several occasions. In February 2019, the Court permitted Mr. Cohen to travel to France. In July and August 2019, the Court approved Mr. Cohen's requests to travel to Spain and Italy. On May 15, 2019, Mr. Cohen entered a guilty plea to a single count of making a false statement in an interview with the FBI. On November 19, 2019, he was sentenced to three months imprisonment and is scheduled to surrender on February 29, 2020.

Mr. Cohen would like to request the Court's permission to travel to Cape Town, South Africa for the holidays with several London friends of his from December 16 through December 27, 2019. He would plan to fly directly from London to Cape Town and back. We respectfully request that the Court order a temporary modification of Mr. Cohen's bail conditions to permit him to take this trip. As noted above, we have advised the

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prosecutors handling this case of this request, and the government has no objection to the request.

Respectfully submitted,

A handwritten signature in black ink that reads "Ronald G. White". The signature is written in a cursive, slightly stylized font.

Ronald G. White

cc: Government counsel (by ECF)